



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ADW  
F. #2014R00150/OCDETF #NY-NYE-653

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 16, 2023

By ECF

The Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Martin Leonel Perez Castro  
Criminal Docket No. 14-465 (BMC)

Dear Judge Cogan:

A status conference in the above-captioned case was previously scheduled for March 15, 2023 at 12:00 p.m. but was adjourned sine die. After consulting with defense counsel, the government writes to respectfully request that the Court schedule a status conference during one of the following times:

- March 20 between 11:00 a.m. and 3:00 p.m.
- March 21 at 3:00 p.m.
- March 23 between 12:00 p.m. and 4:00 p.m.
- March 24 between 10:00 a.m. and 2:30 p.m.
- March 27 between 10:00 a.m. and 4:00 p.m.
- March 28 between 12:00 p.m. and 4:00 p.m.
- March 30 between 10:00 a.m. and 4:00 p.m.

In addition, the government requests that time under the Speedy Trial Act be excluded until the date of the adjourned status conference to facilitate the parties' negotiations. Counsel for the defendant consents to this request to exclude time.

Finally, in advance of the next status conference, the government writes to advise the Court that while the parties continue to engage in plea negotiations, that no agreement in principle has been reached. The government also anticipates that it will request a trial date and a briefing schedule during the next status conference.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/ Andrew Wang  
Andrew D. Wang  
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Assistant U.S. Attorneys  
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cc: Clerk of Court (BMC) (ECF)  
Defense Counsel (by email)